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Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,
14 Plaintiff,

15 v.

16 RYAN ALLEN SISEMORE,
17 a/k/a Ryan Allan Sisemore,
18 VICTOR EASLEY,
19 OSCAR VARGAS,
20 RONNIE RICHARD TURNER,
21 a/k/a Ronnie Allen Turner
22 a/k/a Ronnie Richard Allen Turner
23 a/k/a Ronnie Richard Alle Turner, and
24 FIL FILIMON GUITRON III,
25 Defendants.

) Case No.14-CR-70886-MAG

) STIPULATION AND ~~[PROPOSED]~~ ORDER
) EXCLUDING TIME UNDER SPEEDY TRIAL ACT
) AND RULE 5.1 FROM JANUARY 12, 2016 TO
) February 10, 2016 FOR ALL DEFENDANTS
) AND RESCHEDULING PRELIMINARY
) HEARING TO February 10, 2016

STIPULATION

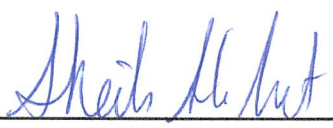
Defendants Ryan Allen Sisemore, Victor Easley, Oscar Vargas, Ronnie Richard Turner, and Fil Filimon Guitron III (collectively, the "Defendants") were charged by complaint in the above-referenced matter in the Northern District of California with conspiracy and possession with intent to distribute a controlled substance, to wit: heroin. In accordance with court orders, the Defendants were released following their arrests and placed in residential drug treatment programs the Eastern or Northern Districts of California. All Defendants have since completed at least one residential treatment program (two of Defendants are currently completing their second treatment programs).

Since their initial appearance on the aforementioned charges, the Government has produced discovery related to numerous drug deals. Following production of discovery, defense counsel and the Government have engaged in discussions about possible pre-indictment resolutions. The parties are presently scheduled to appear on January 12, 2016 for status regarding the Government's potential decision to recommend the Defendants for evaluation by U.S. Pretrial Services for the pretrial diversion program. However, all parties ask for a continuance of the hearing to the next jointly available date of February 10, 2016. The parties make this request to streamline the process by holding all Defendants' appearances on the same date and coordinate their potential referrals to evaluation. For all of the reasons stated, the parties hereby request that the preliminary hearing be rescheduled from January 12, 2016 to February 10, 2016 and submit that good cause exists to exclude and waive time between such dates under Federal Rule of Criminal Procedure 5.1(c) and (d) and the Speedy Trial Act, 18 U.S.C. § 3161, to allow for the effective preparation of counsel, continuity of counsel, and taking into account the public interest in the prompt disposition of a criminal case and Defendants' consent.

IT IS SO STIPULATED.

DATED: 1/12/16

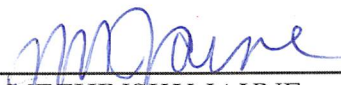
DATED: _____


SHEILA A.G. ARMBRUST
Assistant United States Attorney


ANGELA MILELLA HANSEN
Counsel for Defendant Fil Guitron, III

STIP. AND [PROPOSED] ORDER

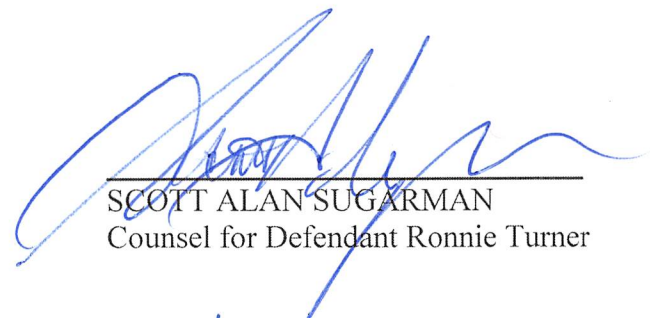
1 DATED: 1/12/16


JULIA MEZHINSKY JAYNE
Counsel for Defendant Ryan Sisemore

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3
4 DATED: 1/12/16


ADAM PENNELLA
Counsel for Defendant Oscar Vargas

5
6
7
8 DATED: 1/12/16


SCOTT ALAN SUGARMAN
Counsel for Defendant Ronnie Turner

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10
11 DATED: 1/12/16


KENNETH HOWARD WINE
Counsel for Defendant Victor Easley

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16
17 **[PROPOSED] ORDER**

18 For the reasons stated by the parties, the Court finds that the aforementioned request is supported
19 by good cause and made with the consent of all defendants in the above-captioned matter. Fed. R. Crim.
20 Proc. 5.1(c) and (d). The Court therefore finds that an exclusion of time between January 12, 2016 and
21 Feb 10, 2016 is merited under Federal Rules of Criminal Procedure Rule 5.1(c) and (d) and the
22 Speedy Trial Act and hereby schedules the preliminary hearing to Feb. 10, 2016.

23 IT IS SO ORDERED.

24 Dated January 12, 2016


HONORABLE DONNA M. RYU
United States Magistrate Judge